

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

THOMAS V. GIRARDI,  
CHRISTOPHER K. KAMON, and  
DAVID R. LIRA

No. 23 CR 54

Judge Ronald A. Guzman

**AGREED MOTION FOR  
EARLY RETURN OF TRIAL SUBPOENAS**

Pursuant to Fed. R. Crim. P. 17(c), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an order permitting the parties to issue trial subpoenas requiring the early return of materials. Undersigned counsel has conferred with counsel for each of defendants Kamon and Lira who have stated that they agree to this motion. Defendant Girardi has not yet appeared or been arraigned.

WHEREFORE, the government respectfully moves for the entry of an order under Fed. R. Crim. P. 17(c) allowing the parties to issue trial subpoenas requiring the early return of materials.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Corey B. Rubenstein  
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